

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

U.S. Securities and Exchange Commission,

Civil No. 11-723 (ADM/TNL)

Plaintiff,

v.

Marlon Quan, Acorn Capital Group,
LLC and Stewardship Investment
Advisors, LLC, Stewardship Credit
Arbitrage Fund, LLC, Putnam Green,
LLC, Livingston Acres, LLC, and
ACG II, LLC,

Defendants,

Florene Quan,

Relief Defendant,

Nigel Chatterjee,

Intervenor,

DZ Bank AG Deutsche
Zentral-Genossenschaftsbank,
Frankfurt am Main,

Intervenor,

Sovereign Bank,

Intervenor,

Topwater Exclusive Fund III, LLC,
Freestone Low Volatility Partners, LP and
Freestone Low Volatility Qualified Partners, LP,

and

Gary Hansen,

Receiver.

**MOTION OF RECEIVER GARY HANSEN TO APPROVE FINAL
DISTRIBUTION AND DISSOLVE RECEIVERSHIP**

Gary Hansen, Receiver for Stewardship Credit Arbitrage Fund, LLC, Putnam Green, LLC, and Livingston Acres, LLC, respectfully moves this Court for an Order approving the final distribution of assets held by the Receiver and dissolving the Receivership as follows:

1. Authorizing the Receiver to reserve \$2,500 to pay the accountant for the preparation of the Receivership Entities' 2017 tax returns including investor K-1s and \$24,379.50 for attorneys' fees incurred and to be incurred to complete the final distribution and close the Receivership;
2. Directing the Receiver to make a final pro rata distribution to Class A and Class P investors of the remaining Receivership Assets, after deducting the attorneys' fees and expenses of the Receiver related to the Class P investors' appeal from those investors' distributions;
3. Granting a release from all claims and causes of action that could arise from the Receiver's and his professionals roles in the Receivership;
4. Dissolving the Receivership effective 10 days after the Court grants the Receiver's motion, to allow the Receiver sufficient time to complete the final distribution;
5. Directing the Receiver to remit any undistributed funds received or remaining after the date of the final distribution, including but not

limited to any unused funds from the flat fee amount awarded to the Receiver for additional attorneys' fees and expenses, to the U.S. Securities and Exchange Commission for inclusion in its restitution proceedings in this case; and

6. Retaining jurisdiction over any and all matters relating to the Receivership.

This motion is supported by the accompanying memorandum in support and the files and proceedings herein.

Date: December 5, 2017

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**RECEIVER AND ATTORNEY FOR
RECEIVER FOR STEWARDSHIP CREDIT
ARBITRAGE FUND, LLC, PUTNAM GREEN,
LLC, AND LIVINGSTON ACRES, LLC**